



December 10, 2010

**VIA ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, DC 20554

**Ross A. Buntrock**

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**Re: Ex Parte Presentation: WC Docket No. 07-135**

Dear Ms. Dortch:

Yesterday, on behalf of Bluegrass Telephone Company, Inc., d/b/a Kentucky Telephone Company ("Kentucky Telephone"), Joe McClung, DeLana McClung, David Carter and I met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell; Margaret McCarthy, Policy Advisor to Commissioner Copps; Brad Gillen, Legal Advisor to Commissioner Attwell Baker; and Wireline Competition Bureau, Pricing Policy Division staff members Al Lewis, John Hunter, and Lynne Engledow.

During the meetings, Joe and DeLana McClung discussed Kentucky Telephone's provision of wireline and wireless broadband internet access, digital video, local and long distance telephone service, dial-up ISP, and conference calling in rural Grayson County, Kentucky, where the company serves over 1,500 residential and business customers, including many of the County's public schools and emergency management facilities. Joe and DeLana discussed the significant investments that Kentucky Telephone has made in its community over the past fifteen years to bring advanced telecommunication services to unserved and underserved populations, including pioneering broadband Internet access in Leitchfield, Kentucky.

We discussed that many IXCs have and continue to pay Kentucky Telephone for terminating calls to its end users that provide conference calling services and that Kentucky Telephone's recently filed federal tariff has been modified in response to the Commission's guidance in the *Farmers and Merchants* case. Joe and DeLana discussed the significant time and expense incurred by Kentucky Telephone in its on-going efforts to end the unlawful self help of Qwest, Sprint, and Level 3, which have refused to pay Kentucky Telephone for both disputed and undisputed traffic, even under Kentucky Telephone's new tariff. These legal battles have diverted resources from Kentucky Telephone's core business operations and forced Kentucky Telephone to downsize its workforce.

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Finally, we discussed the vital need for the Commission to reaffirm its long-standing prohibition against self help and provide certainty to small carriers such as Kentucky Telephone. The attached PowerPoint summarizes the discussion.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Ross A. Buntrock  
*Counsel to Bluegrass Telephone Company, Inc.,  
d/b/a Kentucky Telephone Company*

cc: Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell  
Margaret McCarthy, Policy Advisor to Commissioner Copps  
Brad Gillen, Legal Advisor to Commissioner Attwell Baker  
Al Lewis, WCB, Pricing Policy  
John Hunter, WCB, Pricing Policy  
Lynne Engledow, WCB, Pricing Policy